

Payton, Richard

From: Payton, Richard
Sent: Wednesday, March 7, 2018 11:47 AM
To: 'Landes - CDPHE, Scott'
Cc: bradley.rink@state.co.us
Subject: RE: Technical Section -- EE demonstration

Yes, I looked at the EE O3 deviation from Norm, and had no comments, other than I liked the box and whisker approach.

Richard

From: Landes - CDPHE, Scott [mailto:scott.landes@state.co.us]
Sent: Wednesday, March 7, 2018 10:04 AM
To: Payton, Richard <Payton.Richard@epa.gov>
Cc: bradley.rink@state.co.us
Subject: Re: Technical Section -- EE demonstration

No problem Richard, thanks for getting back to us.

Yes, we are aware that those elements are currently missing from the Conceptual Model. Some of that information is still being compiled. We mostly wanted you to see the meteorological analysis up front to see if it was justifiable. If we needed to make changes, we definitely wanted to get that feedback first as the meteorological analysis/modelling was undoubtedly the most time-consuming portion of this demonstration.

As far as the Conceptual Model is concerned, the "non-event" ozone analysis will be lifted from the "EE O3 Deviation from Norm" file in the Google Drive. If you haven't looked at that yet we'd appreciate if you gave it a quick glance. The regulatory significance portion is still being compiled but will likely be in its own section immediately before the Narrative Conceptual Model.

Thanks again Richard and please let us know if there is anything else we are missing or needs amending.

--Scott

On Wed, Mar 7, 2018 at 9:14 AM, Payton, Richard <Payton.Richard@epa.gov> wrote:

Sorry for the misunderstanding; I did not realize you all were looking for feedback on the drafts; I just wanted them early to get started on my concurrence action; I had not actually started that until I heard Bradley's voice mail this am.

In general, the drafts look like they will meet the need. Just some minor nitpicking on the conceptual model:

Section 3.3: I concur, you don't need to go into ozone augmentation by smoke in detail, based on other prior demos. I would like to see the conceptual model at least mention what you would expect ozone to be like on a 90 or 93 degree day in the 1st week of September, vs. what you did see, and a statement that the smoke likely augmented the concentration; that is your "concept" for ozone on the day and why it is an EE. EE

smoke/ozone guidance, p. 7, Sec. 2.1 (https://www.epa.gov/sites/production/files/2016-09/documents/exceptional_events_guidance_9-16-16_final.pdf), the conceptual model should discuss "chemistry of event and non-event O3 formation in the area". Also is to discuss "the regulatory significance of the proposed data exclusion". I did not see these elements.

Sections 4: To my knowledge, you are the only Q/d > 100 since the ozone/smoke guidance came out. The historical comparisons look excellent; rest covers the needs.

Richard

From: Landes - CDPHE, Scott [mailto:scott.landes@state.co.us]
Sent: Thursday, February 22, 2018 3:14 PM
To: Payton, Richard <Payton.Richard@epa.gov>
Subject: Technical Section -- EE demonstration

Hi Richard,

We have uploaded the technical sections of the EE demonstration to a Google Drive for your review. I wasn't sure if you had a Google account so I sent you an invitation to the folder in the form of a link (you should have received an e-mail -- let me know if it didn't come through).

Feel free to add comments directly to the Word docs or summarize in an e-mail.

Thanks Richard and don't hesitate to contact me with any questions you may have.

Best,

--

Scott J Landes

Supervisor/Air Quality Meteorologist

Meteorology and Prescribed Fire Unit

Technical Services Program



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

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Supervisor/Air Quality Meteorologist
Meteorology and Prescribed Fire Unit
Technical Services Program



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